

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Raquel_Lazo@fd.org

6 Attorney for In Seon Seong

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 IN SEON SEONG,

14 Defendant.
15

Case No. 12-CR-268-JAD-CWH

UNOPPOSED MOTION TO
MODIFY CONDITIONS TO
PERMIT TRAVEL

(Expedited Treatment Requested)

16
17 Comes now the defendant, In Seon Seong, by and through her counsel of record,
18 Raquel Lazo, Assistant Federal Public Defender, and hereby files this Unopposed Motion to
19 Modify Conditions to Permit Travel. This request is based on the Points and Authorities
20 attached hereto.

21
22 DATED this 18th day of July, 2016.

23 RENE L. VALLADARES
Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO
Assistant Federal Public Defender
26 Attorney for In Seon Seong

POINTS AND AUTHORITIES

1) On November 22, 2013, Ms. Seong was released on Pretrial Release Bond with conditions. Her travel was restricted to Clark County, Nevada and the State of New Jersey. CR#67.

2) Ms. Seong seeks permission to travel to Huntington Beach, California to visit her daughter and grandson's. The family will be celebrating her grandson's first 100 days. Ms. Seong will leave Saturday, July 30, 2016 and return on Sunday, July 31, 2016. She will stay at her daughter's residence. Ms. Seong has provided the address to Pretrial Services.

3) Ms. Seong was recently permitted to travel for her grandson's birth. There were no issue during the travel. Ms. Seong remains complaint.

4) Both the government and Pretrial Services Officer Oliver have no opposition to Ms. Seong's request.

Dated this 18th day of July, 2016.

Respectfully submitted,

By: /s/Raquel Lazo

RAQUEL LAZO
Assistant Federal Public Defender
Attorney for In Seon Seong

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: July 19, 2016.

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on July 18, 2016, he served an electronic copy of the above and foregoing **Unopposed Motion to Modify Conditions to Permit Travel (Expedited Treatment Requested)** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
KIMBERLY FRAYN
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Brandon Thomas
Employee of the Federal Public Defender